

In re: Facebook, Inc. Consumer Privacy User Profile Litigation, Case No. 3:18-MD-02843-VC**TIMELINE OF ISSUES RELATED TO NAMED PLAINTIFF DEPOSITIONS**

Date	Description
Sept. 4, 2020	Judge Corley suggests Plaintiffs voluntarily dismiss some of the Named Plaintiffs—“You’re never going to move for class cert with 23 anyway? Right? I mean that’s going to be unreasonable for Judge Chhabria.” Joint Decl., Ex. 40 (Sept. 4, 2020 Tr. at 13:21–23).
Oct. 29, 2020	Plaintiffs inform the Court that they will voluntarily dismiss more than half of the then-Named Plaintiffs. ECF No. 558.
Dec. 21, 2020	Order entering the parties’ stipulation to voluntary dismissal. ECF No. 593. Nine Named Plaintiffs remain.
Oct. 25, 2021	Pursuant to Special Master Garrie’s instruction, Facebook names initial tranche of deponents. It includes 5 current Named Plaintiffs and 5 who had been voluntarily dismissed. Joint Decl., Ex. 41.
Nov. 17, 2021	The parties schedule the deposition of Named Plaintiff Steven Akins for Jan. 20, 2022. Joint Decl., Ex. 44.
Nov. 29, 2021	The parties schedule the depositions of two more Named Plaintiffs—Tyler King (Dec. 20, 2021) and Cheryl Senko (Dec. 10, 2021). Facebook asks Plaintiffs to prioritize deposition scheduling of Named Plaintiffs Jordan O’Hara and Jason Ariciu. Joint Decl., Ex. 48.
Dec. 6, 2021	Facebook moves to depose former Named Plaintiffs whom the parties had voluntarily dismissed. Joint Decl., Ex. 50.
Dec. 14, 2021	Facebook serves notices for the depositions of 5 former Named Plaintiffs whom the parties had voluntarily dismissed. The depositions are noticed for Jan. 14, 17, 24, 26, and 28, 2022.
Dec. 16, 2021	The Special Master denies Facebook’s motion to depose former Named Plaintiffs whom the parties had voluntarily dismissed. Joint Decl., Ex. 52.
Dec. 20, 2021	Facebook serves notices for the depositions of Named Plaintiffs Jordan O’Hara (Jan. 27, 2022) AND Jason Ariciu (Jan. 31, 2022).
Jan. 14, 2022	Plaintiffs serve amended Rule 26 disclosures identifying their damages theories. Joint Decl., Ex. 55.
Jan. 18, 2022	Facebook informs Plaintiffs that it needs to postpone the depositions of Named Plaintiffs Steven Akins (scheduled for Jan. 20), Jordan O’Hara (scheduled for Jan. 27), and Jason Ariciu (scheduled for Jan. 31) in anticipation that it will move to compel additional Rule 26 disclosures regarding Plaintiffs’ damages theories. Joint Decl., Ex. 53.